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April 16, 2004

Marlene Dortch
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

Re: MCI's 2004 Report on the Status of Waived IP-Relay Services
Implementation of the Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of
1996, CC Docket No. 96-128.

Dear Ms. Dortch:

Please find attached MCI's 2004 Report on the Status of Waived IP-Relay Services.

If you have any questions please contact me at the above-listed number

Sincerely,

Larry Fenster

Larry Fenster

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	CC Docket No. 98-67
Individuals with Hearing and Speech)	
Disabilities)	

**ANNUAL REPORT ON WAIVED IP-RELAY SERVICES
WORLDCOM, INC.
d/b/a/ MCI**

In its IP Relay Order on Reconsideration (*Reconsideration Order*), the Commission waived several of its mandatory minimum telecommunications relay service (“TRS”) requirements for five years from the date of publication in the Federal Register, April 16, 2003.¹ The Commission waived the requirements to:

1) automatically transfer calls to emergency services providers, including location information; 2) to provide voice services such as voice carry over service

¹ *In the Matter of Provision of Improved Telecommunications Relay services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Order on Reconsideration (Reconsideration Order)* 68 FR 18825 (2003).

("VCO"), speech-to-speech service ("STS"), and hearing carry over service ("HCO"); and 3) access to pay-per-call providers. WorldCom Inc. d/b/a/ MCI hereby submits its first annual report on the status of progress made towards the resolution of technical problems that formed the basis of the Commission's waiver of the above-mentioned services in its *Reconsideration Order*.

1. Status Of Ability To Automatically Transfer Emergency Calls To PSAPs

The Commission waived the requirement to automatically transfer emergency calls to public service answer points (PSAPs) because the IP-Relay provider does not have the originating automatic numbering information (ANI) of the calling party, and therefore does not have the information needed to automatically identify the caller's location.² That still remains the case today. For this reason, MCI's IP-Relay.com website informs callers that they should use their TTY and telephone when contacting 911.

However if a caller requests emergency service from our IP-Relay operators we will ask them for their city and state and route them to the PSAP.³ MCI is not aware of any existing methodology of accurately linking dynamically assigned IP addresses to a caller's originating ANI. MCI has developed a national

² *In the Matter of Provision of Improved Telecommunications Relay services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Declaratory Ruling and Second Further Notice of Proposed Rulemaking, (IP-Relay Order), CC Docket No. 98-67, rel April 22, 2002, & 30.*

³ MCI's IP-Relay communications assistants (CAs) we handle approximately 60 emergency call per month on average.

database of current PSAP numbers and after making a brief inquiry regarding the caller's location, is able to immediately transfer an emergency call dialed through IP-Relay to the PSAP. This still remains the most accurate method transferring an emergency call to a PSAP.

An alternative sometimes discussed, would require calling parties to register location information with the IP-Relay provider, which would then be transferred to the PSAP associated with the registered location information in the event the caller dialed 911 via IP-Relay. However, MCI's experience is that the user community generally does not support mandatory registration, and voluntary registration would be intermittent at best. Moreover, because IP-Relay permits a calling party to make a relay call from any Internet-enabled device, from any location, it could very often turn out that incorrect location information would be on file at the relay center. Under these circumstances, querying the party who dials 911 via IP-Relay regarding his or her current location is still the most accurate and safest method of transferring such a call to the PSAP.

2. Status Of Ability To Provide VCO, STS, and HCO

The Commission waived the requirement to provide VCO, STS, and HCO for five years, finding that IP-Relay can only be accessed as text service.⁴ While

⁴ *IP-Relay Order*, & 32, *Reconsideration Order*, &18.

broadband connections have improved quality of voice transmission over the Internet, most households still do not subscribe to broadband Internet access service. Similarly, while computer sound cards have improved, the stock of sound cards in most computers is still insufficient to ensure a sufficiently clear communication. Moreover, quality of transmission and quality of user customer premise equipment continues to remain outside the control of IP-Relay providers. Uneven and erratic voice quality still remains a barrier sufficient to maintaining the waiver of VCO, STS, and HCO services.

3. Status of Ability To Access Pay-Per-Call Services

Finally, in its *Reconsideration Order*, the Commission waived the requirement for IP-Relay providers to offer access to pay-per-call services. The Commission determined that it was not technically feasible to provide this service.⁵ In particular, the Commission found that a 900 number call terminates to a recorded announcement that is not answered by a live attendant, making the provision of alternate billing impossible. This is still the case today. Consequently, it is still technically infeasible to connect users to pay-per-call services given the absence of live pay-per-call billing operations. As with voice

⁵ *Reconsideration Order*, & 22.

applications, this circumstance is outside the control of IP-Relay providers.

4. Other innovations.

While, technical conditions remain essentially the same as when the Commission approved waivers for the above-mentioned services one year ago, MCI's Global Relay has made additional innovations available to its customers in areas where it has exercised greater control of technology and terms of service. MCI has developed a service called "IP-Relay Voice." Customers may download and install software onto their computers that allows them to receive incoming relay calls, instant messages from other IP-Relay Voice users, as well as communicate with TTY users. Voice callers can reach a user of IP-Relay Voice, who is logged into the IP-Relay server, by calling a toll free number from anywhere in North America. In addition, the service allows users of other text devices, including TTYs, to communicate via text with customers logged into IP-Relay Voice.⁶

⁶ MCI does not include text-text communications in its request for reimbursement from either state or Interstate TRS Funds. See http://www.ip-relay.com/callback_features.htm for further description of calling features available using IP-Relay Voice.

MCI has also recently added “Wireless IP-Relay” to its menu of competitive relay services. IP-Relay users can now access IP-Relay relay via the Danger, Inc., Hiptop and Sidekick. After downloading and installing terminal client software available for these devices, they are then able to make a wireless IP-Relay call without charge.⁷

If you have any questions, please contact me at the number listed below.

Respectfully Submitted

Larry Fenster

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Thomas Chandler, Director, Disability Rights Office
Cheryl King, Assistant Director, Disability Rights Office

⁷ See, http://www.ip-relay.com/faq_wireless.htm for further description of the steps involved in making wireless IP-Relay calls with these devices..

Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on April 16, 2004

Larry Fenster

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